

Anthony J. Nunes (SBN 290224)
Email: tony@nuneworkerrightslaw.com
Nunes Worker Rights Law, APC
15260 Ventura Blvd, Suite 1200
Sherman Oaks, CA 91403
Telephone: 530-848-1515
Fax: 424-252-4301

Attorneys for Plaintiff
TORE WILLIS

Jeffrey M. Goldman (SBN 233840)
E-mail: jeffrey.goldman@troutman.com
Troutman Pepper Hamilton Sanders LLP
5 Park Plaza, Suite 1400
Irvine, CA 92614
Telephone: 914-567-3547
Fax: 949-863-0151

Attorneys for Defendant
HSC Solutions LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TORE WILLIS,

Plaintiff,

v.

HSC SOLUTIONS LLC, a California
corporation, doing business as Herbi, and
DOES 1-10,

Defendants.

Case No. 3:20-cv-06878-EMC

**JOINT STIPULATION TO DISMISS
PURSUANT TO FRCP 41(a)(1)(A)(II)**

Date of Filing: October 5, 2020

Trial Date: Not Set

1 Plaintiff Tore Willis (“Plaintiff”) and Defendants Defendant HSC Solutions LLC,
2 (“Defendants”) (“collectively, the “Parties”), by and through their counsel of record, hereby
3 stipulate and agree, as follows:

4 WHEREAS, on October 5, 2020, Plaintiff Tore Willis filed a Complaint against
5 Defendant HSC Solutions LLC;

6 WHEREAS, Defendant was served with the Complaint on October 20, 2020;

7 WHEREAS, Defendant’s response to Plaintiff’s Complaint was originally due on
8 November 10, 2020;
9

10 WHEREAS, on November 6, 2020, the Parties stipulated to extend Defendant’s time to
11 file a responsive pleading to December 10, 2020;

12 WHEREAS, on December 7, 2020, the Parties stipulated to extend Defendant’s time to
13 file a responsive pleading to January 25, 2021;

14 WHEREAS, on January 19, 2021, the Parties stipulated to extend Defendant’s time to
15 file a responsive pleading to February 8, 2021;

16 WHEREAS, on February 4, 2021, the Parties stipulated to extend Defendant’s time to
17 file a responsive pleading to February 22, 2021;

18 WHEREAS, on February 22, 2021, the Parties stipulated to extend Defendant’s time to
19 file a responsive pleading to March 8, 2021;

20 WHEREAS, on March 7, 2021, the Parties stipulated to extend Defendant’s time to file a
21 responsive pleading to March 22, 2021;
22

23 WHEREAS, the Parties filed a Notice of Settlement on March 15, 2021;

24 WHEREAS, on March 22, 2021, the Parties stipulated to extend the deadline for
25 Defendant’s responsive pleading to April 22, 2021;

26 WHEREAS on April 21, 2021, the Parties stipulated to extend the deadline for
27 Defendant’s responsive pleading to May 21, 2021;
28

1 WHEREAS on May 21, 2021, the Parties stipulated to extend the deadline for
2 Defendant's responsive pleading to June 3, 2021;

3 WHEREAS, on June 4, 2021, the Parties stipulated to extend the deadline for
4 Defendant's responsive pleading to July 1, 2021;

5 WHEREAS, on June 30, 2021, the Parties stipulated to extend the deadline for
6 Defendant's responsive pleading to July 30, 2021;

7 WHEREAS, in the interest of efficiency and economy, Plaintiff has reached a
8 confidential settlement agreement with Defendant HSC Solutions LLC;

9 WHEREAS, the Parties' settlement agreement includes resolution of only Plaintiff's
10 individual claims;

11 WHEREAS, no answer to the complaint has been filed in the action, no class has been
12 certified in the action, no notice of the action has been sent to putative class members, and the
13 Parties have agreed to the dismissal without prejudice of the class action suit as to the unnamed
14 members of the putative class;

15 NOW THEREFORE, it is hereby stipulated and agreed, by and between the Parties, as
16 follows:

- 17 1) Pursuant to FRCP 41(a)(1)(A)(ii), this action shall be dismissed in its entirety
18 with prejudice as to Plaintiff's individual claims;
- 19 2) This action shall be dismissed in its entirety without prejudice as to unnamed
20 members of the putative class, including the Private Attorneys General Act
21 claims, asserted by Plaintiff in her capacity as an aggrieved employee on behalf
22 of herself and other current or former employees of Defendant; and
- 23 3) All parties are to bear their own attorneys' fees and costs with respect to the
24 dismissal of the action.

25 IT IS SO STIPULATED.

1 Dated: August 2, 2021

Tony Nunes

2 Anthony Nunes
3 Nunes Worker Rights Law, APC
4 15260 Ventura Blvd, Suite 1200
5 Sherman Oaks, CA 91403
6 Telephone: (530) 848-1515
7 tony@nunesworkerrightslaw.com
8 *Attorneys for Plaintiff Tore Willis*

9 Dated: August 3, 2021

Jeffrey M. Goldman

10 Jeffrey M. Goldman
11 TROUTMAN PEPPER HAMILTON SANDERS LLP
12 350 S. Grand Ave., Suite 3400
13 Los Angeles, CA 90071
14 Telephone: (213) 928-9800
15 jeffrey.goldman@troutman.com
16 *Attorneys for Defendant HSC Solutions LLC*

